

Tyshaan C. Williams <u>Debtor</u>	CHAPTER 13
FREEDOM MORTGAGE CORPORATION <u>Movant</u> vs.	NO. 18-18016 JKF
Tyshaan C. Williams <u>Debtor</u>	
Scott Waterman, Esquire <u>Trustee</u>	11 U.S.C. Sections 362 and 1301

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Movant on the Debtor's residence is **\$21,089.64**, which breaks down as follows;

Post-Petition Payments: January 2019 to July 2019 at \$2,865.52

Fees & Costs Relating to Motion: \$1,031.00

Total Post-Petition Arrears \$21,089.64

2. Debtor has stated his intention to surrender the Secured Property to Movant.
3. As no response or opposition has been filed by co-debtor, Kimberly K. Williams, to Movant's Motion for Relief, Debtor takes no position as to Movant being granted relief from the co-debtor stay pursuant to 11 U.S.C. § 1301.

4. Debtor stipulates and agrees that, upon the Court's approval of this Stipulation, Movant shall be granted relief from the automatic stay to pursue its in rem State remedies as to the Secured Property.

5. Upon Court approval, Movant is also granted relief from the co-debtor stay pursuant to 11 U.S.C. § 1301 within this bankruptcy filing.

6. The parties agree that a facsimile signature shall be considered an original signature.

Date: July 9, 2019

By: /s/ Rebecca A. Solarz, Esquire
Attorney for Movant

Date: July 10, 2019



David M. Offen, Esquire
Attorney for Debtors

Date: July 10, 2019

/s/ Polly A. Langdon, Esquire, for

Scott Waterman, Esquire
Chapter 13 Trustee

11th July
Approved by the Court this _____ day of _____, 2019. However, the court
retains discretion regarding entry of any further order.



Bankruptcy Judge
Jean K. FitzSimon

SPOC TEAM
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